

Amy J. Oliver (8785)
olivera@sec.gov
Daniel J. Wadley (10358)
wadleyd@sec.gov
Attorneys for Plaintiff
Securities and Exchange Commission
351 South West Temple, Suite 6.100
Salt Lake City, Utah 84101
Tel. 801-524-5796
Fax: 801-524-3558

FILED
U.S. DISTRICT COURT

2018 MAR -1 2 1:46

DISTRICT OF UTAH

BY: _____
DEPUTY CLERK

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION

SECURITIES AND EXCHANGE
COMMISSION,

PLAINTIFF,

v.

JERSEY CONSULTING LLC, a Nevada
limited liability company, MARC ANDREW
TAGER, an individual, SUZANNE AILEEN
GAGNIER, an individual, KENNETH
STEPHEN GROSS, an individual, JEFFREY
ROWLAND LEBARTON, an individual,
JONATHAN EDWARD SHOUCAIR, an
individual, and JASON VITOLO, an individual,

DEFENDANTS; and

PREMIER MARKETING SOLUTIONS, INC.,
a California corporation, EQUITY FIRST
PROPERTIES INC., a California corporation,
MATTHEW JACOB FREITAS, an individual,
ROXANE MARIE GROSS, an individual,
MATTHEW EARL MANGUM, an individual,
and CHRISTINE L. SHOUCAIR, an individual,

RELIEF DEFENDANTS.

**STIPULATION TO ENTRY OF
PRELIMINARY INJUNCTION
AGAINST DEFENDANT
MARC ANDREW TAGER**

Case No.: 2:18-cv-00155


Judge: Bruce S. Jenkins

This Stipulation is entered into by and among the Securities and Exchange Commission (the "Commission"), and Defendant Marc A. Tager. The Commission and Defendant Tager (collectively the "Parties") hereby stipulate as follows:

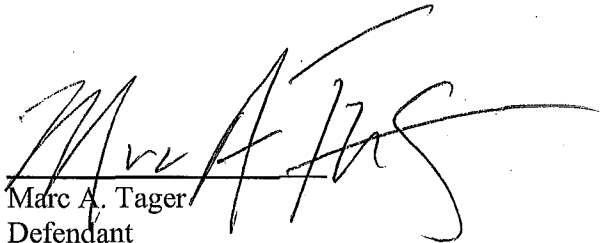
IT IS STIPULATED that pending final adjudication of this matter, or such other time as the Court may order: Defendant and each of his officers, agents, servants, employees and attorneys and those persons in active concert or participation with them who receive actual notice of this Order by personal service or otherwise, including facsimile transmission, electronic mail, or overnight delivery service, are hereby prohibited from soliciting, accepting, or depositing any monies obtained from actual or prospective investors whether directly or indirectly, including, but not limited to, through any entity owned or controlled by each.

IT IS STIPULATED by the Parties that the attached Preliminary Injunction Order should be entered by the Court.

Dated this 1st day of March, 2018.



Amy J. Oliver
Daniel J. Wadley
Securities and Exchange Commission
Attorneys for Plaintiff



Marc A. Tager
Defendant

Amy J. Oliver (8785)
olivera@sec.gov
Daniel J. Wadley (10358)
wadleyd@sec.gov
Attorneys for Plaintiff
Securities and Exchange Commission
351 South West Temple, Suite 6.100
Salt Lake City, Utah 84101
Tel. 801-524-5796
Fax: 801-524-3558

RECEIVED CLERK
MAR 01 2018
U.S. DISTRICT COURT

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION

SECURITIES AND EXCHANGE
COMMISSION,

PLAINTIFF,

v.

JERSEY CONSULTING LLC, a Nevada
limited liability company, MARC ANDREW
TAGER, an individual, SUZANNE AILEEN
GAGNIER, an individual, KENNETH
STEPHEN GROSS, an individual, JEFFREY
ROWLAND LEBARTON, an individual,
JONATHAN EDWARD SHOUCAIR, an
individual, and JASON VITOLO, an individual,

DEFENDANTS; and

PREMIER MARKETING SOLUTIONS, INC.,
a California corporation, EQUITY FIRST
PROPERTIES INC., a California corporation,
MATTHEW JACOB FREITAS, an individual,
ROXANE MARIE GROSS, an individual,
MATTHEW EARL MANGUM, an individual,
and CHRISTINE L. SHOUCAIR, an individual,

RELIEF DEFENDANTS.

**PRELIMINARY INJUNCTION
ORDER**

Case No.: 2:18-cv-00155

Judge: Bruce S. Jenkins

On February 20, 2018, Plaintiff Securities and Exchange Commission filed a Complaint against Defendants Jersey Consulting, LLC and Marc Andrew Tager alleging violations of Sections 5(a), 5(c), and 17(a)(1), (2), and (3) of the Securities Act and Section 10(b) of the Exchange Act and Rule 10b-5 thereunder; against Defendants Suzanne Aileen Gagnier, Jeffrey Rowland Lebarton, Jonathan Edward Shoucair, and Jason Vitolo alleging violations of Sections 5(a) and 5(c) of the Securities Act and Section 15(a) of the Exchange Act; and against Defendant Kenneth Stephen Gross alleging violations of Sections 5(a) and 5(c) of the Securities Act and Sections 15(a) and 15(b) of the Exchange Act. As set forth in the Stipulation of each of the above-named Defendants, each Defendant stipulates to the entry of this Preliminary Injunction Order ("Order"). The court is fully advised in these premises and orders as follows:

IT IS HEREBY ORDERED that pending final adjudication of this matter or at such other time as the Court may order: Defendants Jersey Consulting, LLC, Marc Andrew Tager, Suzanne Aileen Gagnier, Kenneth Stephen Gross, Jeffrey Rowland Lebarton, Jonathan Edward Shoucair, and Jason Vitolo and each of their officers, agents, servants, employees and attorneys and those persons in active concert or participation with them who receive actual notice of this Order by personal service or otherwise, including facsimile transmission, electronic mail, or overnight delivery service, are hereby prohibited from soliciting, accepting, or depositing any monies obtained from actual or prospective investors whether directly or indirectly, including, but not limited to, through any entity owned or controlled by each.

IT IS SO ORDERED this _____ day of _____, 2018 at _____ a.m./p.m.

Bruce S. Jenkins
Senior United States District Judge